


## EG&G ROCKY FLATS

ROCKY FLATS PLANT, P O BOX 464, GOLDEN, COLORADO 80402-0464 (303) 966 7000



91-RF-9487

000028276

Robert M Nelson, Jr  
Manager  
DOE, RFO

Attn F R Lockhart

CLOSURE REQUIREMENTS FOR IHSS's 206 AND 208 (INACTIVE D-836 HAZARDOUS WASTE TANK AND INACTIVE 444/447 WASTE STORAGE AREA, RESPECTIVELY) - JMK-1013-91

Ref D P Simonson ltr (10691) to J M Kersh, Closure Plans for IHSS's 206 (Inactive D-836 Hazardous Waste Tank) and 208 (Inactive 444/447 Waste Storage Area), December 10, 1991

EG&G Rocky Flats, Inc. is in receipt of your letter dated December 10, 1991 regarding the closure of Individual Hazardous Substance Sites (IHSS's) 206 and 208 within Operable Unit No. 10 (OU 10). The RCRA Subtitle C closure requirements, in accordance with 40 CFR, Part 265, Subpart G, for IHSS's 206 and 208 are fully addressed in the Rocky Flats Plant Interagency Agreement (IAG) signed by the Department of Energy (DOE), the Environmental Protection Agency (EPA) and the Colorado Department of Health (CDH) on January 22, 1991. In addition, the IAG has been incorporated into the RFP RCRA Operating Permit Corrective Action Section, thus, all applicable RCRA closure requirements have been, or will be, complied with in accordance with the IAG and/or RFP Permit.

The IAG Statement of Work indicates that the Phase I Interim Measure/Interim Remedial Action (IM/IRA) Decision Document will provide the information required to recommend an alternative consistent with the state's closure regulations. Also, the IAG states "DOE shall concurrently open a public comment period for the Proposed IM/IRA Decision Document to satisfy the public comment requirements for draft closure plans. EG&G believes the IAG has been structured to fulfill all 40 CFR Part 265 Subpart G requirements or the equivalent of the Colorado Hazardous Waste Act (CHWA) requirements for OUs 4, 7, 9, 10, 11 and 15.

If you have any questions regarding this matter, please contact R T Ogg of the Remediation Programs Division at extension 7079 or A L Schubert of the Permitting and Compliance Division at extension 5251

J M Kersh, Associate General Manager  
Environmental and Waste Management

RTO dmf

Orig and 1 cc - R M Nelson, Jr

DIST		LTR	CNC
ENJAMIN, A			
ERMAN, H.S.			
RETZKE, J.C.			
URLINGAME, A.H.			
OPP, R.D.			
ROUCHER, D.W.			
AVIS, J.G.			
VERED, J.E.	X		
ERRERA, D.W.			
RANCIS, G.E.	X		
OODWIN, R.			
ANNI, B.J.			
ARMAN, I.K.			
EALY, T.J.			
EXKER, E.H.			
ENS, J.P.			
ERSH, J.M.	X		
IRBY, W.A.			
UESTER, A.W.			
BIEG, D.			
EE, F.M.	X		
AJESTIC, J.R.			
ARX, G.E.			
EURRENS, B.E.			
ORGAN, R.V.	X		
OTTER, G.L.	X		
ZATO, V.M.			
AEFFEL, R.F.			
ANDLIN, N.R.			
HEPLER, L.B.			
WANSON, E.R.			
TEBE, J.S.			
ILKINSON, R.B.	X		
ILSON, J.M.			
OUNG, E.R.			
ANE, J.O.			
ILHOIT, F.H.			
Joades, J.T.	X		
emison, E.A.	X		
ag RT	X		
Hickok LR	X		
unge PS	X		
rndt MB	X		
hubert AL	X		
WM Tracking	X		
DRIES CONTHOU	x	x	
AFFIC			

CLASSIFICATION

JCI		
CLASSIFIED	(E)	
CONFIDENTIAL		
SECRET		

THORIZED CLASSIFIER  
SIGNATURE

11/15/50

12-24-96

REPLY TO LTR NO

REPLY TO LTR NO

12-125 911

2=  
-PAPERS  
SB [initials]  
LEE [initials]  
- & TYPIST INITIALS  
RTD/dmt  
7079  
-6-50 (Rev 10/91)

## ADMIN RECORD

4 0010 000100